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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ADAM D.
WALTER OF A.B. DATA LTD.
REGARDING SECURITIES
CLAIMANTS' RESPONSES TO
LEAD COUNSEL NOTIFICATION**

I, Adam D. Walter, declare as follows:

1. I am a Director at A.B. Data, Ltd.'s Class Action Administration Company ("A.B. Data"), whose Corporate Office is located in Milwaukee, Wisconsin. A.B. Data was retained by Labaton Keller Sucharow, LLP ("Lead Counsel") to email and mail a notification provided by Lead Counsel to certain rescission or damage claimants ("Securities Claimants") in the above captioned proceedings, establish a website in connection with the notification, and set up a toll-free helpline and email inbox. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

DISSEMINATION OF THE NOTIFICATION

2. At the direction of Lead Counsel, commencing on February 23, 2024, A.B. Data caused an email version of the notification to be sent to 55 distinct email records provided to us by Lead Counsel.

3. Of the 55 email notifications sent by A.B. Data, 45 emails were delivered and 10 were not delivered. An email was considered "delivered" if it was sent and did not bounce back as undeliverable.

4. At the direction of Lead Counsel, on February 26, 2024 A.B. Data mailed a printed version of the notification to 278 distinct mailing records provided to us by Lead Counsel.

5. Both the emailed and mailed versions of the notification alerted recipients to the Reorganized Debtors' pending sufficiency objections (the "Sufficiency Objections") to their rescission or damage claims in the Chapter 11 Cases ("Claims") on the grounds that they failed to state a legal claim, and directed recipients to the website described below. The relevant objections were the Reorganized Debtors' 29th, 30th, 31st, 32nd, 36th, and 37th objections.

WEBSITE

6. At the direction of Lead Counsel, A.B. Data established a website, www.PGESecuritiesClaimants.com, in connection with the notification. The website posts a downloadable version of the current complaint of Lead Plaintiff, the Public Employees Retirement System of New Mexico (“PERA”). The website also provides contact information for Lead Counsel and links to the Reorganized Debtors’ Rescission or Damage Claim Filter and Chapter 11 Cases website.

7. The website homepage alerts notification recipients to the potential dismissal and expungement of their Claims based on the Reorganized Debtors' Sufficiency Objections. The homepage provides a brief summary of the claimants' options for preserving their claims: (i) preparing legal papers or hiring a lawyer to do so, or (ii) selecting a checkbox to adopt PERA's current complaint.

8. More specifically, the website allows Securities Claimants to select the following option:

By selecting the checkbox above, I adopt the current Complaint and legal papers prepared by the court-appointed Lead Plaintiff, the Public Employees Retirement System of New Mexico (“PERA”), and join in PERA’s opposition to PG&E’s motion to dismiss the Complaint on sufficiency grounds for purposes of my Claim. I understand that Labaton Keller Sucharow LLP is not representing me individually. (There will be no cost to you if you adopt the PERA complaint and join in PERA’s opposition.)

9. After selecting this option, the person must provide their name, Chapter 11 Claim Number and contact information.

10. The website was operational beginning on February 23, 2024, and is accessible 24 hours a day, 7 days a week.

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EXHIBIT A

	Tracking Number	PG&E Claim Number	Creditor Name	Name1	Name2
1	492664204	103818	JOHN C & BETTY J DIEKMANN TR UA NOV 29 1991	JOHN	DIEKMANN
2	492664206	97765	ROBERT SCHOOLER	ROBERT	SCHOOLER
3	492664207	98483	MARY ELLEN HELLER MARITAL TRUST #2	MARY ELLEN	HELLER
4	492664208	99104	JAMES MORANDO	JAMES	MORANDO
5	492664209	98864	DUVAL DICKEY	DUVAL	DICKEY
6	492664210	102688	LINDA GAYLE HOWIT	LINDA	HOWIT
7	492664211	103872	ADA MAYERS	ADA	MAYERS
8	492664212	103872	ADA MAYERS	ADA	MAYERS
9	492664213	105460	MICHAEL KEENAN CHARLES SCHWAB & CO CUST IRA	SUSAN	KEENAN
10	492664214	99724	LUCENT TECH INC. DEFINED CONT PLAN MASTER TR NOKIA ATTN SHANNON MATARAZZO		
11	492664216	99426	LUCENT TECHNOLOGIES INC. MASTER PENSION TRUST NOKIA CARE OF SHANNON MATARAZZO		
12	492664217	98871	MASON TENDERS DISTRICT COUNCIL ANNUITY FUND ANNA GUTSIN		
13	492664218	99852	BRUCE ALLEN DAVIS IRA	BRUCE	DAVIS
14	492664219	100515	FEDERICO P COVARRUBIAS AND MARIA	FEDERICO	COVARRUBIAS
15	492664220	100532	MICKEY M. CARROLL	MICKEY	CARROLL
16	492664221	100524	MICKEY M. CARROLL	MICKEY	CARROLL
17	492664222	99424	MALCOLM IAN MCLEAN	MALCOLM	MCLEAN
18	492664223	100037	JESSICA LEA IRBY	JESSICA	IRBY
19	492664224	104701	STATE OF IDAHO ENDOWMENT FUND INVESTMENT BOARD	CHRISTOPHER	HALVORSON
20	492664225	104592	SANDRA BERGER	SANDRA	BERGER
21	492664226	99979	TAAL MASTER FUND LP	LARRY	LEBOWITZ